Appendix F1

Results of a Cultural Resources Phase I Survey

Prepared by: Harris Archaeological Consultants

RESULTS OF A CULTURAL RESOURCES PHASE I SURVEY FOR THE 111 CALEXICO PLACE PROJECT, CITY OF CALEXICO, CALIFORNIA

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Calexico, California USGS 7.5' Quadrangle
Approximately 198 acres
Keywords: Negative Survey; Site HAC-CP-1H, Central Main Canal

July 3, 2006

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1. SUMMARY OF FINDINGS

This report provides the results of a cultural resource Phase I record search, literature review, and survey study for the proposed 230-acre 111 Calexico Place Project (Project), in the City of Calexico, California. The 111 Calexico Place Project proponent proposes to develop the acreage for mixed commercial use.

The purpose of the study is to review previous cultural resource studies and conduct a field survey identifying, and provide impacts assessment of, cultural resources potentially adversely affected by the project. This study was conducted in accordance with guidelines set out in the California Environmental Quality Act (CEQA). Native American consultation was conducted in accordance with California Senate Bill-18.

The record search was conducted at the South Eastern Information Center (SEIC), Imperial Valley College Desert Museum, Ocotillo, California. Results of the record search indicate seven previous cultural resource studies were conducted, and two historic sites (CA-IMP-7594H and 8166H) recorded within one mile of the Project area (study area); none within the Project area.

A pedestrian field survey was conducted using 10 to 12 meter interval transects within the Project area. Ground visibility was excellent (80-100 percent) across the entire property except in the far northwest corner where grasses and reeds grew.

No cultural resources were identified within the Project area during the record search or the field survey. Due to the proximity to the Project area, one historic site HAC-CP-1H, the Central Main Canal, located adjacent to the Project area was recorded at the request of the SEIC. This site, though potentially significant, will not be impacted by the Project. No further study for this resource is recommended at this time. Should the Project area change to include any area of the canal, further study and mitigation for this site would be required.

The project area is near to the buried 40 foot level shore line of ancient Lake Cahuilla. Cultural materials may be present on this buried shoreline. If excavation more than fifteen feet deep is conducted, prehistoric sites may be encountered. Should cultural materials be encountered during construction activities work must stop and a qualified archaeologist is to assess the find.

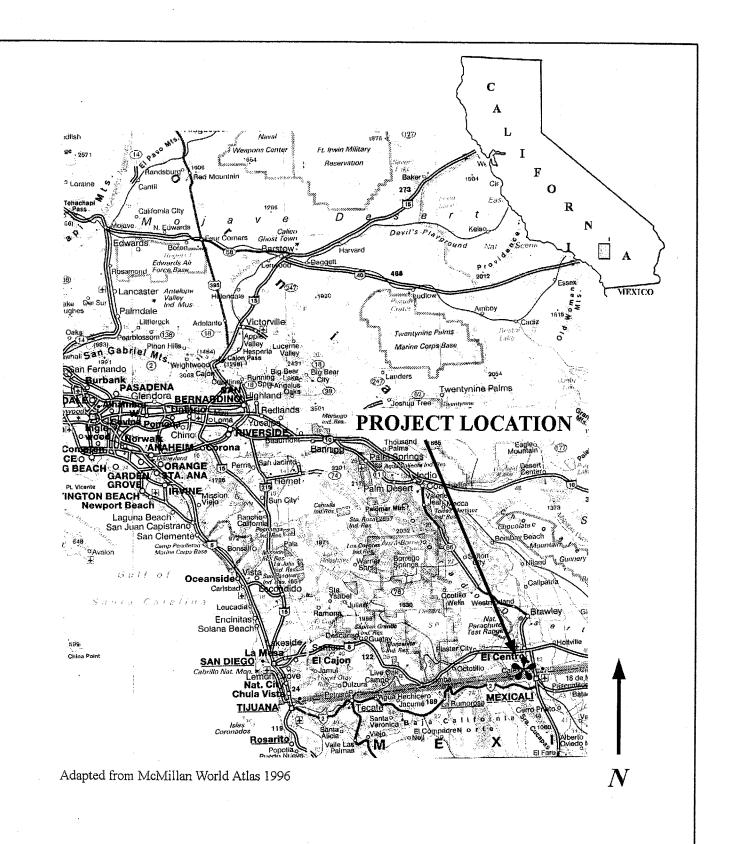
Resumes of personnel are provided in Appendix A, Native American Correspondence is provided as Appendix B, Figure 5 is provided as Appendix C and Site Record is provided as Appendix D.

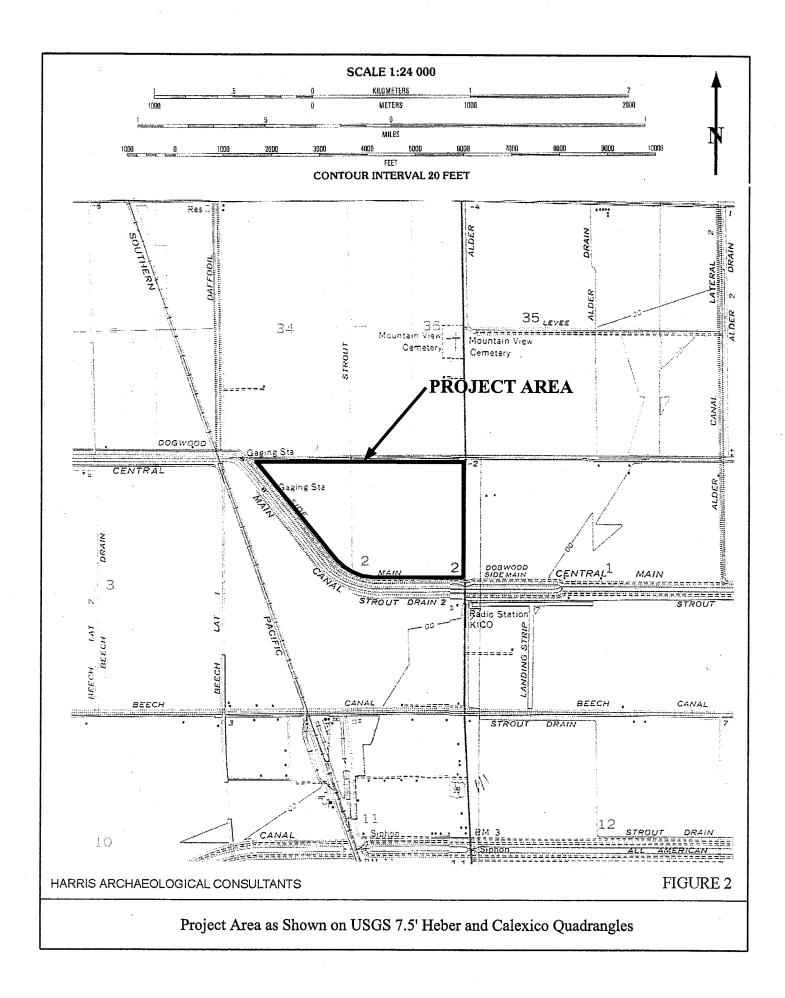
2. INTRODUCTION

A cultural resources study was conducted by Harris Archaeological Consultants (HAC) at the request of HDR Engineering, Inc., of San Diego, California, for the proposed 111 Calexico Place Project located in Calexico, California. The approximately 230-acre Project area is located between the Central Main Canal and Dogwood Side Main Canal on the south to E. Jasper Street on the north, and the intersection of Beech Lateral J and Central Main Canal on the west to Alder Canal Lateral and State Route 99 on the east in the City of Calexico, California (Figure 1). The study considered all previously conducted cultural resources studies and archaeological site records within a one-mile radius of the Project area (study area). In order to provide an accurate account for impacts assessment of cultural resources within the Project area, a pedestrian field survey was conducted within the Project boundaries. The Project and survey area are shown on the USGS 7.5' Heber and Calexico Quadrangles (Figure 2). The record search was performed on June 14, 2006 and survey was conducted on June 11, 13, 14 and 25, 2006 by Nina M. Harris, M.A., RPA of HAC.

3. PROJECT LOCATION AND DESCRIPTION

The Project area occupies most of the east half of Section 2, Township 17S, Range 15E, in the City of Calexico, Imperial County, California, (see Figure 2). The 111 Calexico Place Subdivision Project proponent proposes to develop the acreage for mixed use commercial purposes. The proposed project includes commercial development including office park, entertainment, retail, and hotel land uses.





Presently the approximately 230-acre Project area is fallow agricultural land. Surrounding properties include agricultural land, with the Central Main Canal to the west and south. The Project area has been previously impacted by agricultural activities evidenced by leveling of the landscape and remnant irrigation drainage diversion mounds. Vegetation on the Project area was sparse weeds and grasses.

4. SOURCES CONSULTED

The record search was conducted on June 14, 2006 at the California Historical Resources Information System at the South Eastern Information Center, Imperial Valley College Desert Museum, Ocotillo, California, and included a review of all recorded historic and prehistoric archaeological sites within a one-mile radius study area. The study also reviewed records of all known cultural resource survey and excavation reports. Other sources consulted include lists of the National Register of Historic Places, the California Inventory of Historic Resources and California Register of Historical Resources and California Historical Landmarks, California Points of Historical Interest (2006), and the Office of Historic Preservation Database of Determinations of Eligibility (2006). Historic maps reviewed include USGS Heber 15' 1957 map; Blackburn's Imperial Valley 1936 map, updated 1955 and 1964; and the USGS 30' 1908 Salton Sink map on file at the information center.

Native American consultation was conducted per California Senate Bill-18. Notification letters were prepared and sent to thirteen individuals and groups on June 12, 2006, inviting project participation, and requesting additional knowledge and information regarding the Project area. One response was received on June 18, 2006 from Steve Banegas of the Kumeyaay Cultural Repatriation Committee saying he is unaware of any sacred lands at the project area, but notes the entire area has been continuously inhabited, requesting that if any cultural material and/or remains are discovered that work on the project will stop and they be notified. No other responses were received as of this writing on July 3, 2006. Native American Correspondence is provided as Appendix B.

5. BACKGROUND

A. ENVIRONMENT

The one-mile radius study area is situated within agricultural land segments. Located at the border lands of the United States and Mexico, and approximately six miles to the east of New River, the surrounding area is typically characterized by sandy, silty, level desert terrain, irrigated and turned to farm land. The Project area has been mechanically leveled and used as agricultural land. As part of the regional irrigation system, the Central Main Canal located immediately to the south, west and Alder Canal located east of the subject property. The All American Canal, site CA-IMP-7130H, is located just outside one mile radius to the south. Soils are coarse to fine-grained sandy quaternary sediments, and alluvial deposits.

Elevation varies only slightly around the five foot level above mean sea level (AMSL). Observed flora was limited to a light cover of domestic and desert flora species, domestic trees species along the property boundaries and reeds in the northwest corner. Fauna noted includes desert species and bivalve clams which grow naturally in the canals.

B. PREHISTORY

Archaeological studies conducted in the region include those by Rogers (1939, 1945, 1966); Weide (1976); Crabtree (1981); Warren (1967, 1980), Gallegos (1980); McDonald (1992); Schaefer (1994, 1998); von Werlhof and McNitt (1980), and others. A brief overview is provided below.

Paleo-Indian Tradition

The Paleo-Indian Tradition (or Big Game Hunting Tradition) is the earliest recognized manifestation of human activity in North America dating between (14,000-9,000 BP). Artifacts representing this time frame are limited, and include Clovis and Folsom spear points. The expression of an early Paleo-Indian tradition in the desert region of California is typically associated with Pleistocene playa lakes. During this period it is thought that the inhabitants were moving and migrating, following and hunting big game herds as they moved across the landscape. Little evidence of this period occurs near the Project area.

Early Period

Early period (11,000-1,300 BP) cultural adaptation is widely perceived as responses to the gradual desiccation of the vast pluvial lake systems that once dominated inland basins and valleys across the west at the end of the last glaciation. Early period cultures are represented by more complex artifact assemblages used in more environmentally diverse landscapes compared to the Paleo-Indian Tradition. This economic strategy moved away from migratory herd based economy and made more direct use of access to a wide range of plant, animal, and lithic resources. The Early Period expressions are recognized to have a wide regional similarity of artifacts. Researchers have grouped these contemporaneous complexes together as the Western Pluvial Lakes Tradition or the Western Lithic Co-tradition (Bedwell 1970; Davis et al. 1969; Moratto 1984). Early coastal assemblages include that of the San Dieguito Complex (12,000 to 7,000 BP) which is perhaps an expression of Paleo Indian Tradition transition to Archaic Period.

The Pinto Period (about 7,000 BP to 2,500 BP) in the desert correlates to the Early Archaic La Jolla series of the coastal region typically distinguished by milling equipment. The desert inhabitants of this period made use of marginal water sources that allowed for mobility within the desert setting. Pinto Period sites tend to be sparse scatters representing temporary camps. The Indian Hill Rockshelter located in Anza-Borrego State Park may date to this period. Artifacts associated with this period include shouldered stemmed point series, leaf shaped bifaces and heavy scrapers, made mostly from basalts. The few milling slabs and manos found on these sites suggest a broadening of the subsistence strategy to include hard seeds or grasses.

The Amargosa Period subsistence pattern seems to have changed to concentrating main camps near reliable water sources with temporary satellite foraging and hunting camps in marginal areas. Point types representing this period include Humbolt Concave Base; Gypsum Cave or Elko Corner-notched; Elko Eared; leaf-shaped points; and rectangular based knives. A widening range of artifacts include t-drills, scraper planes, choppers, made of microcrystallines; hammerstones; mano and milling slabs; mortar and pestles; shaft straighteners; incised slate and sandstone tablets; pendants, and faunal Haliotis sp. and Olivela sp. shell ornaments.

The termination of Early Period sequences, which were variable across time and space, involved both developmental processes among endemic peoples and influxes of new populations with different cultural backgrounds.

Later Periods

By roughly 2,000 years ago, Yuman-speaking people had occupied the Gila/Colorado River drainage (Moriarty 1969) and proximal portions of the Colorado and Mojave deserts. Many Late Period (1,700 to 150 BP) prehistoric culture patterns in southern California region were shared with neighboring groups in Nevada and northwestern Arizona; the Colorado and Sonora Deserts of southern Arizona and Sonora, Mexico; and Baja California's Peninsular Range and littoral strips. Possibly by about 1,200 years BP, and certainly by 800 BP, the technology of ceramic manufacture had been introduced from the eastern deserts, marking the end of the Early Period and becoming an integral part of the Late Period assemblage.

This period is marked by another shift in subsistence economies to locations where resources were more consistently abundant. The economic trajectory of the Later Periods is one of more invention and efficient exploitation of local resources represented initially by the Patayan I Period in the southern desert region. Numerous habitation sites scattered throughout southern California and southern Nevada evidence the prosperity of these refined economies.

Subsequent cultural developments during this period in the Salton Trough, located within central Imperial and southeastern Riverside counties, was intermittently filled by at least four stands of freshwater Ancient Lake Cahuilla over the past 2,000 years (Waters 1983). High water stands and associated lacustrine resources temporarily attracted human populations, while periods of evaporation, when the Colorado River returned to its usual course, caused movement to more environmentally stable neighboring areas, such as the Lower Colorado River, the Pacific Ocean littoral strip, and the interior mountains and valleys of the Peninsular and Transverse Ranges.

Archaeological evidence includes village sites, temporary camps, rock enclosure habitation structures, intaglios, trails and fishing weirs. The Patayan influence from the deserts to the east include the presence of ceramics, both brown ware, reflecting mountain and coastal associations, and buff ware types derived from the Colorado River.

C. ETHNOGRAPHY

The Project area is within the territorial cultural boundaries of the Kumeyaay (Ipai and Tipai) Indians. The Kumeyaay belong to the Yuman language family, and the Hokan group. The Kumeyaay territory includes lands between the Pacific Ocean and the Sand Hills in the east, and Hedionda Lagoon south to San Pedro de Martir, south of Ensenada, Mexico. Kumeyaay social structure was that of tribelets or loosely knit bands. Individuals identify themselves with their clan. These bands of up to 30 individuals migrated seasonally to exploit the various resources available from the ocean, plains, mountain and desert environments. Villages tended to be small, mostly temporary camps, with multiple bands may gather together during winter months. Desert Kumeyaay groups practiced horticulture along the river flood plains and the shoreline of ancient Lake Cahuilla (Luomala 1978). These groups traded mostly between themselves but trading did occur between neighboring tribes including the Quechan (linguistically related the Kumeyaay) to the east, Luiseño and Cahuilla to the north and probably with the Paipai to the south. The closest ethnographic village located in the vicinity of the project area is Mountain Springs in the USA and La Rumerosa in Mexico.

Early European contact with Kumeyaay groups was probably during encounters with the Quechan by the Hernando de Alarcon expedition in 1540. Two years later Cabrillo landed at Point Loma in San Diego. Spanish "missionization" of Kumeyaay groups was slow, and these groups resisted vigorously with uprisings. While Mexican occupation caused enslavement it wasn't until the Americans won the war at San Pascual that extermination of the native populations was imposed as federal policy. Much of the Kumeyaay population retreated to the mountains fighting the Americans where they could. By 1875 reservations were located near to larger villages resulting in a patchwork of reservations across San Diego County. Imperial Valley Kumeyaay shared reservations with other tribes. (Luomala 1978, Kumeyaay.com 2005)

D. HISTORY

Historic phases include the Spanish Period (1769-1822), the Mexican Period (1822-1848) and the American Period (1848 to present).

The earliest Spanish expedition known to the region was conducted by Hernando de Alarcon in 1540 with Cabrillo following in 1542. Juan Bautista de Anza expedition crossed the region in 1774 passing through what is now Anza Borrego and continuing north. The early history in Imperial Valley includes the passage of a trading route through the valley located including the Southern Immigrant Trail and Eastern route to San Diego.

As early as 1815 salt was harvested from the Salton Sink area and hauled overland to Los Angeles. In 1885 the New Liverpool Salt Company began salt harvesting operations. The salt was worked by Cahuilla Indian and Japanese laborers (Dainer ND).

The gold fields in northern California bought people who crossed using these routes and included Dr. Wozencroft. Wozencroft envisioned the diversion of the Colorado River as a water resource for agriculture in Imperial Valley, and though not realized during his lifetime, this was eventually completed. In 1896 Charles Rockwood and George Chaufy began the California Development Company in an attempt to draw emigrants to the area. In 1900 the Imperial Land Company was formed to develop irrigation of agriculture when the Desert Land Act was established. The Alamo Canal was the first canal built. The Central Main Canal, passing immediately to the south and west of the Project area, was completed in about 1902. Unusual rains during 1904 overflowed the canal system and water ran into the Salton Sink again creating the Salton Sea.

Rail lines were built to haul agricultural goods from the valley and a branch line was built to connect the Southern Pacific Rail Road (SPRR) in the north county to Niland in about 1907. Concern of flooding prompted

the SPRR to have the California Development Company divert the Colorado River back to its original course. Under the California Irrigation Act, the Imperial Irrigation District was formed in about 1911. This rail line and water, secured by the development of the Coachella Canal in 1948, provided a reliable resource and transportation encouraging further development. Begun initially as a tent city for the Imperial Land Company, Calexico grew into a weekend retreat for valley workers the area was developed for cattle ranching and farming of fruits and vegetables including cantaloupe. Calexico is now thriving town with commercial and industrial growth. The City of Calexico was founded in 1908.

6. FIELD SURVEY METHODS

The cultural resource field survey was conducted on foot by persons walking transects using 10 to 12 meter intervals to insure full Project area coverage. Any cultural resource located during the survey was assigned temporary numbers, recorded on State of California Parks and Recreation Record forms, mapped on USGS 7.5' topographic map and photographed. Site forms were filed with South Eastern Information Center for primary and trinomial number assignment. Photographs are archived at Harris Archaeological Consultants in San Diego, California.

7. STUDY FINDINGS, AND CONCLUSIONS

Record Search Results

The archaeological records and literature search for the Project study area indicate that seven cultural resources studies have previously been performed within a one-mile radius study (Table A). None of these studies were conducted within the Project area. Two historic sites were identified within one mile of the Project area. One of these sites, CA-IMP-8682H, the Southern Pacific Rail Road Imperial and Gulf Branch, is located approximately 900 feet to the west. The second is Southern Pacific Railroad Calexico Spur, CA-IMP-7594H, located approximately one half mile to the southwest. The Blackburns map shows the property noted with the name "Hale". One structure is evident on the USGS 1957 Heber 15' map as located in the northwest corner of the Project area and Strout Drain 2 is shown to cross the property south to north centrally.

SEIC records indicate that the 40 foot level shoreline of ancient Lake Cahuilla is near to the Project area at approximately a 15 foot depth.

Field Results

A field survey was conducted on June 11, 13, 14 and 25, 2006, for the present Project to identify and assess cultural resources that might be present within the Project area. Access was available to all portions of the property. Local head ditch channel extends along the western edge of the property. Elevated access roads extended along the Central Main Canal.

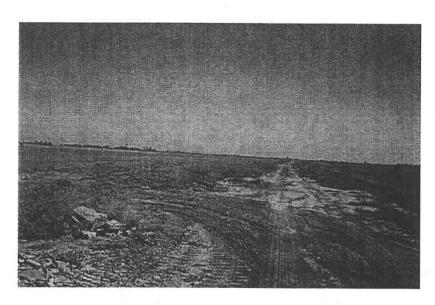
Ground visibility was excellent (80-100 percent) across the Project area and on roads and limited to poor to good (40 to 60 percent) in the northwest corner where reeds and grasses grew (Figures 3 and 4). The entire Project area has been previously impacted by farming. Recent trash littered the roadways in some areas. Rubble piles have been placed where a structure is indicated to have been on the 1957 USGS 15' map (see Figure 4, lower photograph). The rubble appears to be mostly dumped concrete and dead vegetation and none appear to be directly related to any structure. A telephone pole exists in this northwest corner which had likely supplied the structure with electricity. No other evidence of the structure exists.

The Central Main Canal which extends along the south and west boundary of the Project area, is potentially significant, was recorded per request of the SEIC and given the temporary site number HAC-CP-1H (Figures 5 and 6). This site is located extending as a branch of the All American Canal from the junction with the Alamo River on the north to the All-American Canal on the south. A section of the canal extends along the present Project area where it jogs south then east after running parallel to the border north and west of Calexico. This site was recorded per request of the SEIC and is adjacent to but outside the project area under study.

Table A Cultural Resource Studies Previously Conducted within One Mile of the Project Area

Author	Title	Date
ND	Archaeological Assessment of the Kloke Tract for the City of Calexico	ND
Collins	Archaeological Assessment of the Kloke Tract for the City of Calexico	1997
Urban Futures, Inc.	Environmental Impact Report Prepared for the Calexico Regional Mall, Commercial Power Center and Light Industrial Development Project, and Related Site Annexation SCH #93112026	1995
von Werlhof and von Werlhof	Archaeological Examination of the Heber Anomaly	1977
von Werlhof	Archaeological Investigations of the Calexico Industrial Park Site	1975
von Werlhof and Collins	Archaeological Examinations of proposed Geothermal Facilities Near Heber, CA	1979
Walker, et al.	Cultural Resource Study of a Proposed Electric Transmittion Line from Jade to the Sand Hills, Imperial County California	1981

ND=No Data



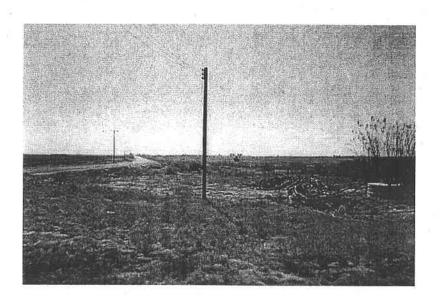
Project Area Overview Looking North



Project Area Overview Looking Northeast



Project Area Overview South End Looking East



Project Area Overview North End Looking East and Location of Structure Shown on USGS 15' Map

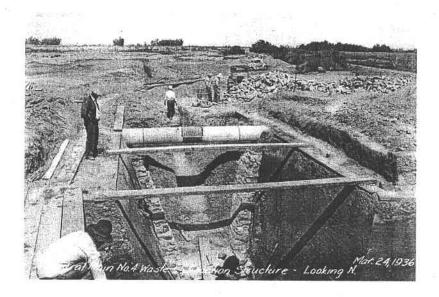
Figure 5

Site HAC-CP-1H as Shown on the Heber and Calexico USGS 7.5' Quadrangle

Bound in Confidential Appendix B



Construction Photograph of Central Main Canal, View West



Construction Photograph of Central Main Canal, View North

A head ditch extends along the west side and Alder Canal Lateral 5A extends along the east side. Strout Drain 2 shown on the USGS 7.5' map extends centrally through the west portion oriented north-south and continues east south of the Central Main Canal. This drain is not evident on the ground surface.

Conclusion

All of this Project area has been impacted by past agricultural use. No evidence of the structure shown on the 1957 USGS 15' map exists. No prehistoric cultural material was identified. Channels similar to the head ditch channel that extends along the west side of the Project area, have been previously recorded as part of a project area in the vicinity of the present Project (see Harris 2006), and are not unique. The Central Main Canal (HAC-CP-1H) is located adjacent to the Project area on the west and south, was recorded per request of the SEIC and the site form is provided as Appendix B.

8. ASSESSMENT AND RECOMMENDATIONS

Assessment

The Central Main Canal was constructed beginning in around 1900 extending from Sharpes Heading in Mexico at the intersection of Aliso and Alamo River at Alamo Levee southwest of Brawley. This was put into service in 1902. This site is potentially significant.

The head ditch channel system, while initially dating to before 1945. A similar head ditch system was recorded on a near by project area and is not unique and not considered important under CEQA guidelines (Harris 2006).

Recommendations

The project area is near to the buried 40 foot level shore line of ancient Lake Cahuilla. Cultural materials may be present on this buried shoreline. If excavation more than fifteen feet deep is conducted, prehistoric sites may be encountered. Should any cultural material be encountered during construction activities work must stop in the area of the find and a qualified archaeologist contacted to assess the find.

Site HAC-CP-1H, the Central Main Canal was recorded at the request of the SEIC. This site is potentially significant but is located outside the present Project area, will not be impacted by the present Project and no further work is recommended for this site at this time. However, should the Project area change where impacts to the site are possible, further study and mitigation will be required.

The head ditch channel system, while initially dating to before 1945, is not unique and not considered important under CEQA guidelines. No further work is recommended for this site.

The archaeological survey was confined to those areas where the ground surface was exposed. Should the Project area change, additional study will be required. Should unanticipated buried cultural resources (Native American or historic) be encountered during any construction activities such as those noted to possibly exist below 15 foot depth, it is California State policy that work in that area must halt until a qualified archaeologist can evaluate the nature and significance of the find. If human remains are unearthed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98.

Certification

I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this archaeological report, and that the facts, statements, and information presented are true and correct to the best of my

knowledge and belief.Date: 7-3-2006

Nina M. Harris, M.A., R.P.A. Harris Archaeological Consultants

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Final Environmental Impact Report/Environmental Impact Statement Imperial Irrigation

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CH2mHill, Oakland, California

APPENDIX A Resume

12283 CARMEL VISTA RD. #217 HARRIS ARCHAEOLOGICAL SAN DIEGO, CA 92130 C O N S U L T A N T S

Nina M. Harris, M.A., R.P.A. Owner/Principal 12283 Carmel Vista Road #217 San Diego, California 92130 858-509-1282 Business and Fax 858-603-8022 Cell E-mail: ninahac@earthlink.net

Ms. Harris is an archaeologist with 15 years of experience in cultural resources management and has overseen survey, testing, mitigation, and report-writing phases for projects requiring CEQA/NEPA and local compliance programs throughout southern California. She has managed sub-consultants, conducted Native American Correspondence, worked with various federal, state and local agencies, and prepared application documentation for National Registry of Historic Places listing. Projects have included linear corridors and site-specific development. Ms. Harris has authored or co-authored over a hundred reports, and has managed analysis for historic and prehistoric projects. Areas of research include prehistoric ceramics and fire-altered rock analysis. She completed a workshop on geophysics in archaeology with the National Park Service in 2002, and has obtained HAZWOPER and BNSF railroad safety training in the past. Ms. Harris' expertise includes prehistoric landscape archaeology and geophysical prospecting techniques in archaeology. She started Harris Archaeological Consultants in 1998 and now manages the business full time. Ms. Harris has been a member of the Register of Professional Archaeologists since 1998.

EDUCATION:

M.A. Archaeology, University of Durham, Durham, England DH1 3HP U.K., 1991

B.A. British Studies/Visual Arts, New England College, Henniker, New Hampshire 03242, 1978

PROFESSIONAL AFFILIATIONS:

Registry of Professional Archaeologists Society of American Archaeology Society for California Archaeology San Diego County Archaeology Society

RECENT PROFESSIONAL EXPERIENCE:

Harris Archaeological Consultants, San Diego, CA

November 2001 to Present

Owner/Principal Investigator for cultural resource management projects.

Applied EarthWorks, Inc, San Diego

May 2002 to Present

<u>Staff Archaeologist</u> for various cultural resource management projects both prehistoric and historic including various Caltrans projects, and Los Angeles Metropolitan Water District, Whitewater Mining Pit Reclamation Project.

Earth-Tech, Colton, CA

November 2001 to May 2002

Field Direction for Section 106 eligibility testing of 30 prehistoric sites at Edwards AFB.

HDR, Engineering, Inc., San Diego, CA

November 1999 to November 2001

<u>Principal Investigator</u>: Duties included management of National Environmental Protection Act (NEPA) and California Environmental Quality Act (CEQA) compliance programs for high profile clients, interfacing with federal and state agencies including the BLM, California Desert District and California Public Utilities Commission for Phases I, II and III studies including eligibility determinations, treatment and mitigation measures.

APPENDIX BNative American Correspondence

12283 CARMEL VISTA RD. #217 HARRIS ARCHAEOLOGICAL SAN DIEGO, CA 92130 C O N S U L T A N T S

June 8, 2006

Manzanita Band of Mission Indians ATTEN: EPA Director PO Box 1302 Boulevard, CA 91905

Dear Sir,

Harris Archaeological Consultants (HAC), acting as agent for the City of Calexico through the Project proponent, is preparing a prehistoric archaeological survey report for the proposed 111 Calexico Place Project (Project). The Project includes the mixed commercial use on approximately 160 acres in the Calexico area of Imperial County. The location of the Project area is depicted on the enclosed portion of the Heber and Calexico USGS 7.5' Quadrangles.

As part of our research, HAC is contacting Native American groups and individuals to help identify any prehistoric sites or sacred sites or landscapes located in the vicinity of, or which might be affected by, the proposed Project. As a matter of procedure, HAC has already consulted the South Eastern Information Center in Ocotillo and the Native American Heritage Commission in Sacramento.

This letter also serves to inform you of your invitation to participate in consultation per Senate Bill 18. Under Section 65362.3 of the Government Code., you have 90 days to request participation. However to provide guidance for the report process we would request relevant information to be provided sooner.

If you have any information that would be relevant to our analysis of the proposed Project's potential effect on cultural resources, please provide a written or verbal response by June 29, 2006. Thank you for taking the time to review our request. Please feel free to call me at 858-509-1282 or my cell phone at 858-603-8022 if you have any questions or comments.

Sincerely,

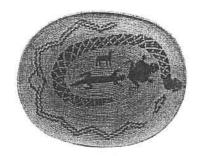
Nina Harris Principal Archaeologist Harris Archaeological Consultants 12283 Carmel Vista Rd. #217 San Diego, CA 92130 E-mail: ninahac@earthlink.net

Mission Statement

To protect and preserve ancestral remains, sacred lands and sacred objects under the Native

American and Ciraves Protection Act

NACPRA for today and future generations.



Member Tribes Barona Campo Ewñaapaayp Inaya Jamal La Posta Manzanita Mesa Grande

San Pasqual Santa Ysabel Sycuan Viejas Steve Banegas, Spokesman

Kumeyaay Cultural Repatriation Committee

June 14, 2006

Ms. Nina Harris, Principal Archaeologist Harris Archaeological Consultants 12283 Carmel Vista Road, #217 San Diego, CA 92130

Reference: Proposed 111 Calexico Place Project

Dear Ms. Harris:

We received your letter of June 8, 2006, concerning the subject project. Regarding your invitation to participate in consultation per Senate Bill 18, we are unaware of the existence of any sacred lands at the project area; however, since the entire area has been continuously inhabited, there may be burials and/or cultural materials which could be uncovered during the course of the project.

The primary concern of our organization is with the repatriation and reburial of remains. In the event of the discovery of cultural materials and/or remains it is our understanding that work on the project will halt and we will be notified. If you have questions regarding this letter, please feel free to contact me at the Barona Tribal Office at 619/443-6612.

Sincerely,

Steve Banegas

Tem Bamp

Spokesman, Kumeyaay Cultural Repatriation Committee Chairman, California Repatriation Oversight Commission

1095 Barona Road Lakeside. CA 92040 * Phone 619-4+3-6612 or 390-1588 Fax 619-4+3-0681



QUECHAN INDIAN TRIBE Ft. Yuma Indian Reservation

P.O. Box 1899 Yuma, Arizona 85366-1899 Phone (760) 572-0213 Fax (760) 572-2102

July 17, 2006

Harris Archaeological Consultants Ms. Nina Harris, Principal Archaeologist 12283 Carmel Vista Road #217 San Diego, CA 92130

Dear Ms. Harris.

Thank you for notifying us of your proposed work for the proposed 111 Calexico Place Project.

We have reviewed the areas in which you will be conducting your projects and have determined that there is no potential impact on any cultural resources affiliated with the Quechan Indian Tribe.

Again, we thank you for your notification. If you need any further information or have any questions, please contact me at (760) 572-2423.

Sincerely,

Bridget R. Nash-Chrabasez Historic Preservation Officer